

**EXHIBIT A: UPDATED LIST RE PLAINTIFFS' PROPOSED CUSTODIANS**

	<b>Name, Title</b>	<b>Hitachi Entity</b>	<b>Basis For Designating Custodian</b>					<b>Hitachi's Reasons for Excluding Custodian</b>	<b>Plaintiffs' Response</b>
			<b>Hitachi Initial Disclosures</b>	<b>Hitachi Response to DOJ Subpoena</b>	<b>Hitachi Org. Chart</b>	<b>Hitachi Response to Interrogatory No. 2</b>	<b>Hitachi Individual In Chunghwa Documents</b>		
1	<b>James Aden,</b> VP & Gen. Manager ("GM") of Sales	HED(US) HAL	X	X		X		No custodian specific information; departed HED(US) in 1999.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
2	<b>Kenichi Fukuzawa,</b> President	HED(US)		X		X		No custodian specific information; departed HED(US) in 2000.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
3	<b>Kazumasa Hirai,</b> Vice President ("VP")	HED(US)		X		X		No custodian specific information; departed HED(US) in 2001.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
4	<b>Ryoji Hirai,</b> VP & GM, Sales;  VP & GM, Electron Tube Sales Division ("ETSD")	HED(US) HAL	X	X	X	X		The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>
5	<b>Bradley ("Biff") W. Kinney,</b> E. Coast Sales Mgr, ETSD	HED(US) HAL	X	X	X	X		The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>
6	<b>Yoshima Komori,</b> Japanese Accounts Sales Manager, Sales Dept. 1	HED(US)	X	X	X	X		If Plaintiffs mean "Yoshihisa Komori," then Hitachi Defendants will agree to include this individual as a custodian.	<b>Yes, Plaintiffs mean "Yoshihisa Komori" and agree to this custodian.</b>

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7	<b>Takashi Masuko</b> , President	HED(US)		X		X		No custodian specific information; departed HED(US) in 2002.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
8	<b>Robert Daniel Mead</b> , Sr. Sales Mgr, Sales Dept. 2; W. Coast Sales Mgr, ETSD	HED(US) HAL	X	X	X	X		The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>
9	<b>Yuji Mitsumoto</b> , Sales Manager	HED(US)		X		X		No custodian specific information; departed in 2002.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
10	<b>Tomoyuki Saito</b> , Senior VP	HED(US)		X		X		No custodian specific information; departed in 1999.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
11	<b>Hideharu Sakamoto</b> , Senior Sales Manager	HED(US)		X		X		The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>
12	<b>Thom Schmitt</b> , Senior Sales Manager, ETSD; Sales Director, ETSD	HED(US)	X	X	X	X		The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>
13	<b>Shuichi Tago</b> , Asst Mgr, Sales and Marketing Planning Group; Mgr., Image & Info. Media Sys. Div.	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.

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14	<b>Mikio Yotsu,</b> Sr. Mgr., Consumer Products & Info. Media Sys. Group  GM of Digital Media Sales Op. Division	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.
15	<b>Takashi Matsunga,</b> Dept. Director/Rep., CRT Sales	HTC			X	X		No custodian specific information; retired in 1995.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
16	<b>Satoshi Sakuma,</b> --GM, Image & Information Systems Division; --Mgr., Image & Info. Media Sys. Div. ("IIMSD"); --Sr. Mgr., Digital Media Systems Division	HTC			X	X		No custodian specific information; retired in 2003.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
17	<b>Shunichi Akimoto,</b> Deputy GM, Info. Media Sys. Group;  Sr. Mgr., Info. Media Sys. Group	HTC			X	X		Deceased; no custodian specific information; retired in 2002.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.

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18	<b>Yasuhiro Morishima,</b> -Mgr., Consumer Products & Info. Media Sys. Group; -Mgr., Info. Media Sys. Group; -Mgr., Digital Media Sales Op. Division	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.
19	<b>Hideaki Ito,</b> -Exec. GM, VP & CEO, Electronic Devices Sales & Marketing Group; -Exec. Gen. Manager, Semiconductor & Integrated Circuit Group	HTC		X		X		No custodian specific information; departed HDP in 2002. Mr. Ito was involved in the CRT tubes business only.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
20	<b>Kenji Takahashi,</b> -Mgr., AV Consumer Products Division -Mgr. of Digital Media and Sales Division -Sr. Mgr. of Digital Media Sales Division	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.

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21	<b>Hideo Tsutsui,</b> --Sr. Mgr, Planning of Digital Equip. Div.  --Planning of Commercial Goods Division—Strategy of overseas business, promotion of alliance, planning of CTV and digital equip. and sales and marketing planning.	HTC		X	X			No custodian specific information; retired in 2001.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
22	<b>Yasuhiro Yakushiji,</b> Mgr. of Image & Info. Media Sys. Div.  Sr. Engineer of Image & Info. Media Sys. Div.  Sr. Engineer of AV Consumer Products Division  Mgr. of Digital Media Sys. Div. Sr. Engineer of Dig. Media Grp.	HTC		X	X			The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>

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23	<b>Hideharu Nagaoka,</b> Manager, IISD  Mgr., Digital Media Sys. Div.	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.
24	<b>Kazuaki Yamamoto,</b> Manager, IISD  Mgr, Digital Media Sales Op. Div.	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.
25	<b>Shigeki Takahashi,</b> Mgr, Digital Media Sales Op. Div.	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.
26	<b>Yukio Tamura,</b> Sr. Mgr., Dig. Media Sales Op. Div.	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.
27	<b>Toshiyuki Ono,</b> Manager of Digital Media Sales Op. Div.	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.
28	<b>Shinitzu Narazaki,</b> Manager of Digital Media Sales Op. Div.	HTC			X	X		No custodian specific information has been located; continuing to search.	The parties will continue to meet and confer about this individual.

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29	<b>Toshitaka Tajimi,</b> Senior Engineer, IISD  Senior Manager, Digital Media Sales Division	HTC			X	X		No custodian specific information; retired in 2002.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
30	<b>Akira Inoue,</b> Senior Manager, Strategic Marketing & Sales Promotion Department	HTC HDP		X	X	X		The Hitachi Defendants will agree to include this individual as a custodian. Involved in CRT tubes only.	<b>Plaintiffs agree to this custodian.</b>
31	<b>Nobuhiko Kobayashi,</b> Senior Manager, Total Production Control Dept. Mobara Manufac. Op.	HTC HDP	X	X	X	X		The Hitachi Defendants will agree to include this individual as a custodian. Involved in CRT tubes only.	<b>Plaintiffs agree to this custodian.</b>
32	<b>Hiromi Ootani,</b> Sr. Mgr, Consumer Elec. Sales Dept.,  GM and Exec Vice GM, Elec. Devices Sales & Marketing Div., Semiconductor & Integrated Circuit Group	HTC HDP		X	X	X		The Hitachi Defendants will agree to include this individual as a custodian. Involved in CRT tubes only.	<b>Plaintiffs agree to this custodian.</b>

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33	<b>Kazuo Sakamoto,</b> Sr. Mgr, CRT Sales & Marketing, Elec. Tubes Sales Dept.  Sr. Mgr, Int'l Sales Div., Display Product Sales Group	HTC HDP		X	X	X		The Hitachi Defendants will agree to include this individual as a custodian. Involved in CRT tubes only.	Plaintiffs agree to this custodian.
34	<b>Yoshimichi Shibuya,</b> GM, Int'l Display Sales Div., Elec. Devices Sales & Marketing Div.	HTC HDP HED (US)		X		X		The parties already agreed to include this individual as a custodian. Involved in CRT tubes only.	Plaintiffs still agree to this custodian.
35	<b>Koichi Touyumi,</b> Sr. Mgr., Industrial Elec. Sales Dept. 2, Electronic Devices Trade Div.	HTC HDP		X		X		The Hitachi Defendants will agree to include this individual as a custodian. Involved in CRT tubes only.	Plaintiffs agree to this custodian.
36	<b>Yoshiyuki Uchida,</b> Sr. Mgr., Strategic Marketing and Sales Promotion Dept. Managerial Staff for CEO, Displays Asst. to GM, Bus. Planning Div.	HDP		X	X	X		No custodian specific information; retired in 2002.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.

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37	<b>Ryuichi Ueda,</b> Sr. Mgr., CRT Sales & Marketing Div. Sr. Engineer, Sales Eng. Dept. No. 1	HDP		X	X	X		No custodian specific information; retired in 2002.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
38	<b>Takeo Takemoto,</b> Exec. Managing Dir., Elec. Tube Division	HDP			X	X		No custodian specific information; retired in 1993.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
39	<b>Kouichi Maruyama,</b> Sr. Deputy GM, Elec. Tube & Dev. Div. GM, Elec. Tube & Dev. Div. Pres. and CEO of Displays	HDP			X	X		Deceased; no custodian specific information; retired in 2004.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
40	<b>Kiyoshi Kubo,</b> Mgr., Strategic Marketing & Sales Promotion Dept.	HDP			X	X		The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>
41	<b>Mitsuru Yamada,</b> Assist. Mgr, Elec. Device Div, Market Research Grp.	HDP			X	X		No custodian specific information; retired in 2000.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.

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42	<b>Fumiaki Yonai</b> , Exec. VP, Displays  President and CEO of Displays	HDP			X	X		The Hitachi Defendants will agree to include this individual as a custodian.	Plaintiffs agree to this custodian.
43	<b>Masayuki Sato</b> , Sr. Deputy GM, of Electron Tube & Devices Div.  Exec.VP, Displays	HTC			X	X		Deceased as of 2004; no custodian specific information; Mr. Sato was involved in the CRT tubes business only.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
44	<b>Chien-Lu Chang</b> , Senior Manager	HAS (Taipei)					X	Hitachi Defendants cannot identify an employee by this name.	Plaintiffs provided Hitachi with additional information for identification.
45	<b>Jian-Long Zhang</b> , Senior Manager	HAS (Taipei)					X	Hitachi Defendants cannot identify an employee by this name.	Plaintiffs provided Hitachi with additional information for identification.
46	<b>Cheng-Chen Chien</b> , Senior Manager	HAS (Taipei)					X	Hitachi Defendants cannot identify an employee by this name.	Hitachi to consider whether this might be " <b>Chang Chien Chang Argus</b> " identified in HAS Supp. Resp. to Interrog. No. 2.

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47	Mr. Lu, Head of Division (Director?)	HAS (Taipei)					X	Please provide us with add'l info re Mr. Lu, such as given name and dates Plaintiffs believe that Mr. Lu was employed by HAS.	Plaintiffs provided Hitachi with additional information for identification.
48	Mr. Kimura, Head of Sales Dept.	HAS (Taipei)					X	Please provide us with add'l info re Mr. Kimura, such as given name and dates Plaintiffs believe that Mr. Kimura was employed by HAS	Plaintiffs provided additional information. Hitachi to consider whether this might be "Yoshihiko Kimura" identified in HAS Supp. Resp. to Interog. No. 2.
49	Mr. Sakashita	HAS (Taipei)					X	Please provide us with add'l info re Mr. Sakashita, such as given name, dates Plaintiffs believe that Mr. Sakashita. was employed by HAS.	Plaintiffs provided additional information. Hitachi to consider whether this might be "Kazuhiro Sakashita" identified in HAS Supp. Resp. to Interog. No. 2.
50	Mr. Fukuzawa, President	HTC					X	Please provide us with add'l info re Mr. Fukuzawa, such as given name, dates Plaintiffs believe that Mr. Fukuzawa. was employed by HAS.	Plaintiffs provided Hitachi with additional information for identification.
51	Guojun Yang	SEG Hitachi					X	The Hitachi Defendants cannot identify an employee by this name.	Plaintiffs provided Hitachi with additional information for identification.

52	Jianmin Huang	SEG Hitachi					X	The Hitachi Defendants cannot identify an employee by this name.	Plaintiffs provided Hitachi with additional information for identification.
53	Chenqun Li	SEG Hitachi					X	The Hitachi Defendants have identified Mr. Chenqun Li, who served as Vice President and Vice Chairman of non-Hitachi Defendant entity that was not involved in the CRT tubes or CRT finished products businesses. No custodian specific information related to Mr. Li's purported tenure at SEG-Hitachi was identified.	Plaintiffs provided Hitachi with additional information to ensure this is the same person.
54	Peng Guo	SEG Hitachi					X	The Hitachi Defendants cannot identify an employee by this name.	Plaintiffs provided Hitachi with additional information for identification.
55	Yufang Wang	SEG Hitachi					X	The Hitachi Defendants cannot identify an employee by this name.	Plaintiffs provided Hitachi with additional information for identification.

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56	<b>Tadashi Yamada,</b> Sr Mgr., Sales Dept. 2, Int'l Display Salas Div, Elec. Devices Sales & Marketing Div.	HDP	X	X				The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>
57	<b>Isao Yoshimi,</b> Exec. GM (and Sr. and GM), CRT Business Division	HDP		X	X			The Hitachi Defendants will agree to include this individual as a custodian.	<b>Plaintiffs agree to this custodian.</b>
58	<b>Akira Kojima</b>	HAL	X					No custodian specific information.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.
59	<b>Akira Okubo,</b> Sales	HAL	X	X				No custodian specific information; departed HED(US) in 1999.	Hitachi to provide information re: backup tapes; the parties will continue to meet and confer.